

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Paul R. Jones, Jr.)	Case No. 17-17369
Jennifer K. Jones)	Chapter 13 Proceedings
)	
Debtors.)	Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTORS'
FIRST MOTION TO MODIFY PLAN**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtors' First Motion to Modify Plan filed with the Court on March 6, 2018 (hereinafter "Debtors' Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee's Objection to Confirmation filed with the Court on March 6, 2018 has not been resolved. Specifically, the following paragraphs are not resolved: 1) Prosecution: Debtors need to provide October 2017 credit union statement and all savings statements for one savings account; and 2) Disposable Income.

2. The Debtors' proposed plan does not comply with Section 1322(d) of the Bankruptcy Code as the plan will complete in over 60 months.

3. Part 5.1 of Debtors' proposed plan the equity portion should not be completed.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtors' Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala

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CERTIFICATE OF SERVICE

I certify that on March 12, 2018, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William J. Balena, Attorney, on behalf of Debtors, at docket@ohbksource.com

And by regular U.S. mail, postage prepaid, on:

Paul R. Jones, Jr., Debtor and Jennifer K. Jones, Debtor at 775 North Main Street,
Grafton, OH 44044

/S/ Holly Davala

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